

North Eastern California Water Association

P.O. Box 367, McArthur, CA 96056

NECWA's Mission is to protect and enhance water rights, water quality and riparian areas to the benefit of agriculture, the environment, recreation, and wildlife in the Northeastern California region.

September 28, 2018

Walter Plachta
Central Valley Water Board
1685 E Street
Fresno, CA 93706

Delivered via email to: walter.plachta@waterboards.ca.gov

RE: 2018 Joint Triennial Review of the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin

Dear Mr. Plachta:

The Northeastern California Water Association (NeCWA) has reviewed the prioritization criteria. We commented last year regarding the *Reassessment of Beneficial Uses and Water Quality Objectives in Specific Reaches of the Pit River, for the 2018 Joint Triennial Review*. Geology and hydromorphology of the Pit River has been studied and documented for over 50 years and recorded in scientifically, replicable methodologies. Personal communication and resource dependent managers have watched and worked with the Pit Rivers' ebbs and flows for far longer than that. The Pit is a very different river in Alturas than it is as it enters the confluence of the Fall River and subsequently into Lake Britton and then onto Lake Shasta.

The documented differences over the past decades clearly indicate that the Pit, within its' reaches, should have clear delineation between designations of WARM and COLD fisheries and the beneficial uses that go along with those designations.

We thank you for including this review among the projects in this update of the Triennial Review. While today is not the time to discuss individual projects, I did want to express to the Board that the NeCWA Board sees an opportunity to elevate this project under the Prioritization Criteria before you today. Specifically, the Project Prioritization Process Criteria that elevates *Projects that represent an Efficient Use of Board Resources*. We are ready to explore with our Resource Conservation District and technical partners, and the Regional Board initiating and finding funding to undertake the collaborative stakeholder process for achieving this Basin Plan project. This would meet the Board's priority of supporting *Projects with resource commitments from other agencies and/or stakeholders that build upon existing studies or research represent an efficient use of Board resources*.

Thank you for continuing to elevate this very important discussion of simple on-paper designations and projects. Realigning this one simple item gets the Board closer to its' goal of efficiency and embracing management criteria on the ground.

Sincerely,

Willy Hagge

Willy Hagge, President

North Eastern California Water Association

C: Dr. Karl Longley, Chair, CVRWQCB
Bruce Houdeshelt, Northern CA Water Association